



ILLINOIS STATE SENATE
FREEDOM OF INFORMATION ACT OFFICER
ROOM 605A STATE HOUSE
SPRINGFIELD, IL 62706

Via E-Mail

October 1, 2019

Jamie Munks
State Government Reporter
Chicago Tribune
Statehouse Pressroom, Springfield
312-982-9891
jmunks@chicagotribune.com

Daniel Petrella
Chicago Tribune
dpetrella@chicagotribune.com

Re: FOIA Request Received September 24 and 26, 2019

Dear Ms. Munks and Mr. Petrella:

On September 24 and 26 2019, this office received three Freedom of Information Act ("FOIA") request ("Requests"), dated September 24 and 25 2019 respectively, wherein the following records were requested:

...any and all subpoenas or search warrants received by the Senate related to Sen. Martin Sandoval from July 22, 2019 through today (Sept. 24) for his Capitol or district office..

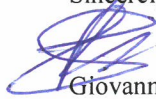
Any and all documents shared by federal agents in conjunction with the law enforcement search of Senate offices in the Illinois Capitol on Tuesday, September 24, 2019, including but not limited to a list of items agents removed from the Capitol.

Pursuant to a conversation between Mr. Patterson and Ms. Munks, I am combining these Requests into one response.

Enclosed, please find the public records responsive to your Requests. Please be advised that some information related to the above request has been redacted from the enclosed records pursuant to 5 ILCS 140/7(1)(b), 5 ILCS 140/7(1)(c), 5 ILCA 140/7(1)(d)(i), (ii), and (iv) (pursuant to *Twin-Cities Broadcasting Corp. v. Reynard*, 277 Ill. App.3d 777, 783 (4th Dist. 1996) and *Kelly v. Village of Kenilworth* 2019 Ill. App. (1st) 170780 (June 21, 2019)), and Ill. Att'y Gen. Pub. Acc. Op. No. 16-009.

Thank you for your cooperation. With kindest personal regards, I remain

Sincerely yours,

A handwritten signature in blue ink, appearing to be 'G. Randazzo', written over the printed name.

Giovanni R. Randazzo
FOIA Officer

GRR:sjg
Enclosure

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

In the Matter of the Search of:

Case Number: [REDACTED]

The offices located at 111 Capitol Building,
Springfield, Illinois, further described in Attachment
A-1

UNDER SEAL

SEARCH AND SEIZURE WARRANT

To: [REDACTED] any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Central District of Illinois:

See Attachment A-1

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

See Attachment B-1

YOU ARE HEREBY COMMANDED to execute this warrant on or before October 7, 2019 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

Date and time issued: September 23, 2019 2:06 p.m.

City and State: Springfield, Illinois

[REDACTED] Judge's signature
Tom Schanzle-Haskins, U.S. Magistrate Judge

Printed name and title

Return

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

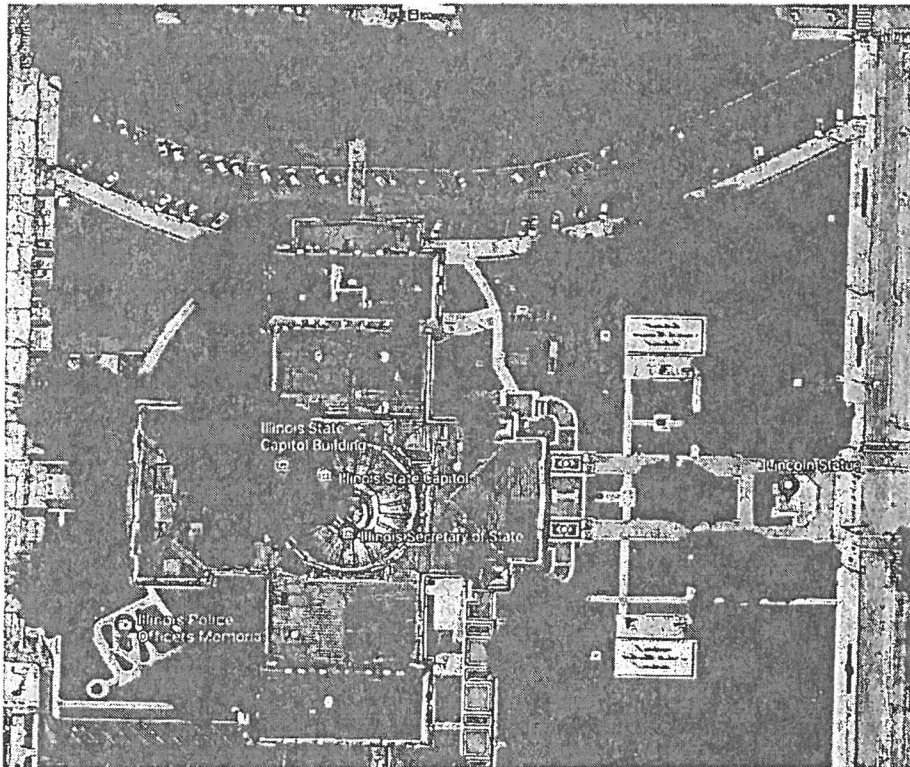
Executing officer's signature

Printed name and title

ATTACHMENT A-1

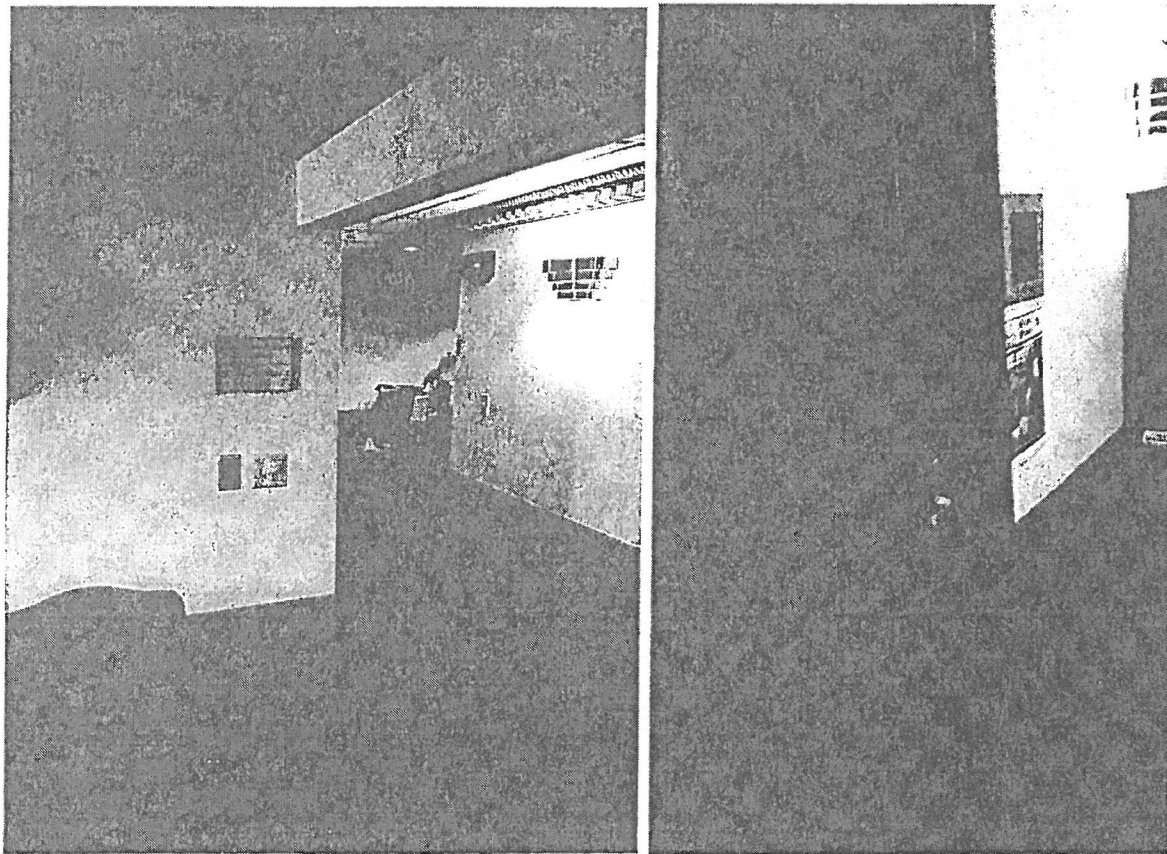
DESCRIPTION OF PREMISES TO BE SEARCHED

Sandoval's Offices consist of office space in the corridor leading to, an office space immediately outside of, and an office inside of 111 Capitol Building, which is located at 402 South 2nd Street, Springfield, Illinois, to the west of 2nd Street and to the east of Spring Street. Sandoval's Offices are located on the first floor of the Illinois Capitol Building, roughly where the red arrow is in the following picture.



A goldish sign to the east of the entrance to the corridor says, "SENATOR SANDOVAL'S ASSISTANT," along with an arrow pointing south. The corridor leads south down a hall with greenish carpeting, white walls, and brownish trim to an area

where a brownish desk is located. To the east of the desk is a brownish door with a sign to the south of the door that says, "111." Below are pictures of (1) on the left, the corridor leading to room 111, with the desk located toward the rear of the corridor, in the middle section of the picture; and (2) on the right, the door to room 111.



Sandoval's Offices include the area from the entrance to the above corridor and south to the office space outside of room 111, in addition to room 111.

ATTACHMENT B-1

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1341, 1343, 1346, 1349, and 1951, as follows:

1. Items related to [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] Official A, [REDACTED] Official B, any business or partner related to any of those individuals, [REDACTED] Inc., [REDACTED] Official A's Company, [REDACTED] any employee, officer, or representative of [REDACTED], [REDACTED], any employee, officer, or representative of [REDACTED] a [REDACTED] lounge, and/or any issue supported by any of those businesses or individuals, including but not limited to [REDACTED].
2. Items related to [REDACTED], Lobbyist A, and/or Lobbyist B.
3. Items related to [REDACTED], Inc., [REDACTED], Inc., any business owned or controlled by Martin Sandoval, any client of any such business, any person or entity that has made payment to or agreed to make payment to any such business, any official action related to such businesses, Municipality 7 Attorney, Municipality 7 President, Municipality 7 President's Political Organization, Municipality 7 Attorney's law firm, and/or Political Action Committee 1.
4. Items related to [REDACTED], [REDACTED], [REDACTED], [REDACTED] and/or Concrete Company A.

5. Items related to [REDACTED], [REDACTED], any employee, officer, partner, representative, or business related to either of those individuals, [REDACTED] Inc., [REDACTED], any employee, officer, or representative of those businesses, [REDACTED] and/or any issue supported by any of those businesses or individuals, including but not limited to [REDACTED]

6. Items related to [REDACTED] any employee, officer, partner, representative, or business related to [REDACTED] [REDACTED] LLC, [REDACTED] Corporation, any employee, officer, or representative of any of those businesses, and/or any issue supported by any of those businesses or individuals.

7. Items related to Construction Company A Official 1, Highway Company A Official 1, Highway Company A Official 2, any employee, officer, partner, representative, or business related to either of those individuals, Construction Company A, Highway Company A, any employee, officer, or representative of any of those businesses, and/or any issue supported by any of those businesses or individuals.

8. Items related to [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], Associate A, [REDACTED] Associate B, [REDACTED] Associate C, any employee, officer, partner, representative, or business related to any of those individuals, [REDACTED] Corporation, [REDACTED] LLC, [REDACTED] Corporation, [REDACTED], [REDACTED]

[REDACTED] Inc., [REDACTED] Club, the [REDACTED]
[REDACTED] Foundation, [REDACTED] Corporation, [REDACTED] Companies,
[REDACTED] Ltd., [REDACTED] [REDACTED] Associate A's Company, any
employee, officer, or representative of any of those businesses, and/or any issue
supported by any of those businesses or individuals, including but not limited to
[REDACTED]

9. Items related to [REDACTED], [REDACTED] any employee, officer, or representative
of any of those businesses, [REDACTED] Official A, [REDACTED] Official B, [REDACTED] Official C,
[REDACTED] Official D, and/or any issue supported by any of those businesses or
individuals, including but not limited to [REDACTED].

10. Items related to IDOT Official A, IDOT Official B, IDOT Official D,
IDOT Official E, and/or IDOT Official F.

11. Items related to any official action taken in exchange for a benefit.

ADDENDUM TO ATTACHMENT B-1

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic-storage media and copying of electronically stored information found in the premises described in Attachment A-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic-storage media removed from the premises described in Attachment A-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized, as set forth in Attachment B-1;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized, as set forth in Attachment B-1 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not: (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized, as set forth in Attachment B-1; and
- d. opening or reading portions of files, and performing key-word searches of files, in order to determine whether their contents fall within the items to be seized, as set forth in Attachment B-1.

The government will return any electronic-storage media removed from the premises described in Attachment A-1 within 30 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic-storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

UNITED STATE DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
RECEIPT FOR PROPERTY

Case ID: [REDACTED]

On (date) 9/24/2019

item(s) listed below were:

- ☒ Collected/Seized
☐ Received From
☐ Returned To
☐ Released To

(Name) _____

(Street Address) 401 South 2nd Street Suite 111 Springfield, Illinois

(City) SPRINGFIELD, IL

Description of Item(s):

Apple computer, model number A1311, serial number [REDACTED]

Apple laptop, model number A1708, serial number [REDACTED]

Not collected

iPad, model A1550, serial number [REDACTED]

HP Compaq Elite 8300 desktop computer, serial number [REDACTED]

iPhone, model A1387, serial number [REDACTED]

iPhone, model A1332, serial number [REDACTED]

iPhone, model A1303, serial number [REDACTED]

iPhone, model A1532, IMEI [REDACTED]

iPhone, model A1241, S/N [REDACTED]

Friends of Martin Sandoval, December 2017 spreadsheets

Seven (7) USB drives

Shredded paper

File labeled "IDOT", letters from [REDACTED], file w/ documents from [REDACTED]

Mail addressed to Ms. [REDACTED]

Statement of economic interest, documents ref. Cicero IL

Invoices and correspondence with [REDACTED] Inc., agreements between [REDACTED] Inc. + other entities

Flash drive with [REDACTED] written on it

Documents ref. [REDACTED] Inc. and [REDACTED]

UNITED STATE DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
RECEIPT FOR PROPERTY

Received By:

[Redacted Signature]

(signature)

Received From:

[Redacted Signature]

(signature)

Printed Name/Title:

[Redacted Name/Title]

Special Agent FBI

Printed Name/Title:

(None present)